

REMARKS

This is a full and timely response to the outstanding final Office Action mailed July 10, 2006. Claims 1 – 18 remain pending. Reconsideration and allowance of the application and presently pending claims are respectfully requested.

Rejections Under 35 U.S.C. § 102

The Office Action indicates that claims 1, 2, 4 - 9, 11 - 18 stand rejected under 35 U.S.C. § 102(e) as being anticipated by *Romanik*. As set forth in detail below, Applicants respectfully traverse the rejections.

In this regard, *Romanik* involves the storage of information. Specifically, *Romanik* discloses:

Every image that is transferred from the client 205 to server 210 can be appended with a unique identifier which is globally unique among all clients and all images. This identifier serves to uniquely identify a specific image and also to synchronize images between multiple clients. This unique identifier is appended in addition to any identification information that might have been previously appended by the image analysis system. This unique identifier can be used as a primary key in an image database to reference an image. The synchronization methods allow the server to use this unique identifier to ascertain the source and time frame when the image was generated. In the preferred embodiment of the invention, the unique identifier has four components: client identifier, image source identifier, time identifier, and user specified identifier. The user-specified identifier is an optional piece of information supplied by the image analysis system to further identify the image. The client identifier is a field to uniquely identify a client. This can be generated in any fashion but using information derived from the network address or machine name of the client is preferred. The image identifier uniquely identifies the image source on a client. For clients that transmit images only from a single source, this identifier is a constant. The time identifier designates the time when the image is passed to the client transfer mechanism 320. The time field must be of sufficient resolution to prevent two images from having the same unique identifier. This time field is also synchronized among multiple clients so that images on the server received from a plurality of clients can be associated with each other. The time identifier must be synchronized between multiple clients to prevent ambiguity between images in the image database. The time

identifier need not have any relationship with the current time of day, but in the preferred embodiment of the invention, the time identifier is the time of day as measured on the server. The server periodically transmits its current time of day to each client so that each client can synchronize its time identifier to this value.
(*Romanik* at [0049]). (Emphasis added).

Thus, *Romanik* involves identification of information that is to be stored. However, *Romanik* does not disclose a particular manner of storage, much less the particular manner of storage recited in Applicants' claims.

The Office Action contends, however, that the aforementioned teachings of *Romanik* disclose “storing use data in a designated location of memory . . .” (Office Action at page 5). Applicants respectfully disagree. In this regard, *Romanik* merely appends an identifier to each of the images and uses these identifiers to access the images. There is no indication, either implicitly or explicitly, that the identifiers are somehow used to ensure “that each data set corresponding to a particular user is stored in a designated location of memory of the warehouse, as recited in claim 1, for example. Additionally, there is no indication, either implicitly or explicitly, that the identifiers are somehow used to ensure that each such data set corresponding to a different device for capturing the data [is] stored in a separate portion of the location,” as recited in claim 1, for example.

Applicants respectfully assert that Applicants' interpretation of *Romanik* is consistent with teachings of *Romanik*. In this regard, *Romanik* discloses the following:

Server 210 receives image 305 via network 335. The architecture of server 210 is very similar to client 205 in that it contains a server reception mechanism 340 and queue 345. The server reception mechanism 340 is responsible for receiving images from network 335 and making them available to storage 215 or processing 220. In the preferred embodiment of the invention, images received by the server reception mechanism 340 are saved to storage 215 as part of an image database, although immediate processing of these images can also be

done via processing 220. *Storage 215 can be any type of storage device including system memory, mass storage, or other offline storage methods. The image database itself can range from a simple file system to a complete relational database, although any method of storing and retrieving images can be used.* The processing block 220 is useful for any immediate processing that is necessary to the image, including but not limited to image display, thumbnail generation, statistical analysis, and classification. Storage 215 and processing 220 are not dependent on each other and either one or both of these blocks may exist in a system.

(*Romanik* at [0026]). (Emphasis added).

Based on the foregoing, it does not appear that *Romanik* regards a particular storage methodology as being germane to his invention. These distinctions are in direct contrast to the limitations recited in Applicants' claims as set forth below.

In this regard, claim 1 recites:

1. A data warehousing system, comprising:
a plurality of uniquely-identifiable data capturing devices; and
a warehouse for receiving and storing at least one set of
captured data from each device according to an identity of the device
that captured each data set *such that each data set corresponding to a particular user is stored in a designated location of memory of the warehouse, with each such data set corresponding to a different device for capturing the data being stored in a separate portion of the location.*

(Emphasis Added).

Applicants respectfully assert that *Romanik* is legally deficient for the purpose of anticipating claim 1. That is, *Romanik* does not teach or otherwise disclose at least the features/limitations emphasized above in claim 1. In particular, *Romanik* does not teach or otherwise disclose at least “each data set corresponding to a particular user is stored in a designated location of memory of the warehouse, with each such data set corresponding to a different device for capturing the data being stored in a separate portion of the location.” Therefore, Applicants respectfully assert that claim 1 is in condition for allowance.

Since claims 2 and 4 - 7 are dependent claims that incorporate the limitations of claim 1, and are not otherwise rejected by the Action, Applicants respectfully assert that these claims also are in condition for allowance. Additionally, these claims recite other limitations that can serve as an independent basis for patentability.

With respect to claim 8, that claim recites:

8. A method of warehousing data, comprising the steps of:
 - receiving at least one set of captured data from each of a plurality of uniquely-identifiable data capturing devices; and
 - storing the received data sets according to an identity of the device that captured each data set *such that data sets corresponding to a particular user are stored in a designated location of memory of the warehouse, with the data sets corresponding to a different device for capturing the data being stored in a separate portion of the location.*

(Emphasis Added).

Applicants respectfully assert that *Romanik* is legally deficient for the purpose of anticipating claim 8. That is, *Romanik* does not teach or otherwise disclose at least the features/limitations emphasized above in claim 8. In particular, *Romanik* does not teach or otherwise disclose at least “data sets corresponding to a particular user are stored in a designated location of memory of the warehouse, with the data sets corresponding to a different device for capturing the data being stored in a separate portion of the location.” Therefore, Applicants respectfully assert that claim 8 is in condition for allowance.

Since claims 9 and 11 - 13 are dependent claims that incorporate the limitations of claim 8, and are not otherwise rejected by the Action, Applicants respectfully assert that these claims also are in condition for allowance. Additionally, these claims recite other limitations that can serve as an independent basis for patentability.

With respect to claim 14, claim recites:

14. A computer readable medium for warehousing data, the computer readable medium having stored thereon computer executable instructions for performing the computer implemented method comprising:

receiving at least one set of captured data from each of a plurality of uniquely identifiable data capturing devices;

storing the received data sets according to an identity of the device that captured each data set *such that each data set corresponding to a particular user is stored to a designated location of memory of the warehouse and each data set corresponding to a different device for capturing the data is stored in a separate portion of the location*; and

providing direct access to each of the stored data sets via the Internet.

(Emphasis Added).

Applicants respectfully assert that *Romanik* is legally deficient for the purpose of anticipating claim 14. That is, *Romanik* does not teach or otherwise disclose at least the features/limitations emphasized above in claim 14. In particular, *Romanik* does not teach or otherwise disclose at least “each data set corresponding to a particular user is stored to a designated location of memory of the warehouse and each data set corresponding to a different device for capturing the data is stored in a separate portion of the location.” Therefore, Applicants respectfully assert that claim 14 is in condition for allowance.

Since claims 15 - 18 are dependent claims that incorporate the limitations of claim 14, Applicants respectfully assert that these claims also are in condition for allowance. Additionally, these claims recite other limitations that can serve as an independent basis for patentability.

Rejections Under 35 U.S.C. § 103

The Office Action indicates that claims 3 and 10 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Romanik* in view of *Balakrishnan*. Applicants

respectfully traverse. In particular, *Balakrishnan* does not teach or reasonably suggest at least the features emphasized above as lacking in *Romanik* with respect to independent claims 1 and 8. Since claims 3 and 10 are dependent claims that incorporate the limitations of claims 1 and 8, respectively, Applicants respectfully assert that these claims also are in condition for allowance. Additionally, these claims recite other limitations that can serve as an independent basis for patentability.

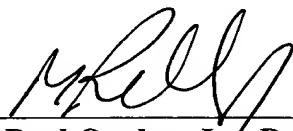
Cited Art Made of Record

The cited art made of record has been considered, but is not believed to affect the patentability of the presently pending claims.

CONCLUSION

Applicants respectfully submit that the pending claims are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (770) 933-9500.

Respectfully submitted,



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I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail, postage prepaid, in an envelope addressed to: Assistant Commissioner for Patents, P. O. Box 1450, Alexandria, VA 22313-1450, on 8/24/06.

Stephanie Riley
Signature